

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Wilkes-Barre Division*

IN RE:

DARRELL R. HAZEL AKA DARRELL  
RICARDO HAZEL AKA DARRELL HAZEL  
AKA DARRELL HAZEL, SR. AKA DARRELL R.  
HAZEL, SR. AKA DARRELL RICARDO  
HAZEL, SR.

Case No. 5:23-bk-00156-MJC

Freedom Mortgage Corporation,  
Movant

Chapter 13

vs.

DARRELL R. HAZEL AKA DARRELL  
RICARDO HAZEL AKA DARRELL HAZEL  
AKA DARRELL HAZEL, SR. AKA DARRELL R.  
HAZEL, SR. AKA DARRELL RICARDO  
HAZEL, SR. ,  
Debtor

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Motion to Modify Chapter 13 Plan* (Doc 58), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on January 25, 2023.
2. Movant holds a security interest in the Debtor's real property located at 905 ASTIBLE WAY, East Stroudsburg, PA 18301 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on May 12, 2025 (Doc 58).
4. Movant filed a Proof of Claim in this case on April 4, 2023 (Claim No. 12) which

lists a total debt of \$412,002.41.

5. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtor are inaccurate and do not conform to Movant's timely-filed Proof of Claim. The correct pre-petition arrearage due Movant is \$95,445.16, whereas the Plan proposes to pay only \$22,058.56.

6. Movant objects to Debtor's proposed Chapter 13 Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

7. Movant objects to any plan which proposes to pay it anything less than \$95,445.16 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

»

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Wilkes-Barre Division*

IN RE:

DARRELL R. HAZEL AKA DARRELL  
RICARDO HAZEL AKA DARRELL HAZEL  
AKA DARRELL HAZEL, SR. AKA DARRELL R.  
HAZEL, SR. AKA DARRELL RICARDO  
HAZEL, SR.

Case No. 5:23-bk-00156-MJC

Freedom Mortgage Corporation,  
Movant

Chapter 13

vs.

DARRELL R. HAZEL AKA DARRELL  
RICARDO HAZEL AKA DARRELL HAZEL  
AKA DARRELL HAZEL, SR. AKA DARRELL R.  
HAZEL, SR. AKA DARRELL RICARDO  
HAZEL, SR. ,  
Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing  
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN has been  
electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Tullio DeLuca, Debtor's Attorney  
381 N. 9th Avenue  
Scranton, PA 18504  
tullio.deluca@verizon.net

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Courthouse, US Trustee  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

DARRELL R. HAZEL  
905 ASTILBE WAY  
EAST STROUDSBURG, PA 18301

Date: May 23, 2025

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com